

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

NOKIA CORPORATION and)
NOKIA, INC.,)
)
Plaintiffs,)
) C. A. No. 05-16-JJF
v.)
)
INTERDIGITAL COMMUNICATIONS) JURY TRIAL DEMANDED
CORPORATION and INTERDIGITAL)
TECHNOLOGY CORPORATION,)
)
Defendants.)

DEFENDANTS' NOTICE OF FED. R. CIV. P. 30(B)(6) DEPOSITION

TO: Plaintiff Nokia Corporation and Nokia Inc., by and through their attorneys of record, Jack B. Blumenfeld, Morris, Nichols, Arsh & Tunnell L.L.P., 1201 N. Market Street, Wilmington, Delaware 19801.

PLEASE TAKE NOTICE that the oral deposition of one or more corporate representatives of Nokia Corporation and Nokia Inc. (collectively "Plaintiff"), designated pursuant to Federal Rule of Civil Procedure 30(b)(6), will be taken by stenographic and videographic means on September 22, 2006, beginning at 9:30 a.m., Eastern Standard Time, at the law offices of Alston & Bird L.L.P., 90 Park Avenue, New York, New York 10016. The deposition will continue from day to day if the deposition is not completed on September 22, 2006. The deposition will be taken before an officer who is authorized by law to take depositions and by audio-video recording device. It may be attended by a corporate representative of InterDigital Communications Corp. and/or InterDigital Technology Corp. (collectively "InterDigital"). Plaintiff is to present for the deposition corporate representative(s) to testify on its behalf with knowledge of the following on which examination is requested:

1. The facts underlying Plaintiff's claim in paragraph 142 of the Complaint for Declaratory Judgments of Patent Invalidity and Noninfringement and Violations of the Lanham Act Relating to 3G Mobile Phone Technology (the "Complaint") that "InterDigital has used false or misleading descriptions or representations in connection with its patent portfolio, the WCDMA standard, the CDMA 2000 standard, Nokia's products, the applicability of InterDigital's patents to Nokia's products, and the applicability of InterDigital's patents to 3G wireless standards within the meaning of 15 U.S.C. § 1125(a) (§ 43(a) of the Lanham Act).";
2. The facts underlying Plaintiff's claim in paragraph 142 of the Complaint that "This misconduct of InterDigital has inhibited the development of 3G technology, damaged Nokia's business and its reputation in the wireless market.;"
3. The facts underlying Plaintiff's assertion in Count XXI and the Prayer for Relief in the Complaint that InterDigital's allegedly false statements have damaged Plaintiffs, including the type, nature, and scope of the damages;
4. The facts underlying Plaintiff's assertion in its Answering Brief in Opposition to Defendant's Motion to Dismiss Pursuant to Fed. R. Civ. P. 12(b)(1), 12(b)(6), and 12(h)(3) that the allegedly false statements made by InterDigital "...influenced purchasing decisions by raising costs for all market participants...increased production costs for Nokia and raised the cost of Nokia developing and marketing standards compliant technology and deterred Nokia's customers from purchasing Nokia's standards compliant products.;"
5. Plaintiff's answers to the Defendants' First Set of Interrogatories to Plaintiffs served on or about May 1, 2006; and
6. The facts underlying Plaintiff's claim in paragraph 146 of the Complaint that "InterDigital has made these false statements in bad faith and with knowledge of their falsity."

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Dated: August 31, 2006

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IN THE UNITED STATES DISTRICT COURT
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CERTIFICATE OF SERVICE

I, David E. Moore, hereby certify that on August 31, 2006, the attached document was hand delivered to the following person(s) and was electronically filed with the Clerk of the Court using CM/ECF which will send notification to the registered attorney(s) of record that the document has been filed and is available for viewing and downloading:

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I hereby certify that on August 31, 2006, I have Electronically Mailed the documents to the following:

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